

**‘IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA, \***

**\***

**VS.**

**\* CRIMINAL NO.: DKC18-066**

**ASHLEY COLLIER,**

**\***

*Defendant*

**\***

**MOTION FOR LEAVE TO FILE ADDITIONAL  
MOTIONS UPON COMPLETION OF DISCOVERY**

Comes now, Ashley Collier, the defendant, through undersigned counsel, Marc G. Hall, Esq. and respectfully moves this Honorable Court pursuant to Rule 45(b) of the Federal Rules of Criminal Procedure to enlarge the time by which to file additional motions which may come to light upon completion of discovery process in this case and for reasons states as follows:

1. The Court set a due date for defense motions on May 31, 2018.
2. Discovery is ongoing in this matter. Additional discovery is expected to be provided.
3. Until counsel has had an opportunity to review all the relevant discovery material it is impossible for counsel to determine what if any additional motions are needed in the Defendant’s case at this time

Wherefore, the defendant requests the opportunity to file motions after May 31, 2018 should discovery indicate the need for additional motions.

Respectfully submitted,

Law Offices of Marc G. Hall, P.C.

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Document was electronically delivered, this 31st day of May 2018 to: The United States Attorney's Office, Baltimore, MD.

/s/

Marc G. Hall